

**Exhibit C**

September 22, 2021 Email from Brian Rosen

**Gordon, Robert D.**

---

**From:** Rosen, Brian S. <brosen@proskauer.com>  
**Sent:** Wednesday, September 22, 2021 12:10 PM  
**To:** Gordon, Robert D.  
**Cc:** Bienenstock, Martin J.; Bienenstock, Martin J.; Osaben, Libbie B.; 'Johnson, Craig'; Possinger, Paul V.  
**Subject:** RE: Puerto Rico: retiree solicitation packages

**External Email – Exercise Caution**

Bob,

Thank you very much for the email and the alert as to your intentions.

First, as you know from our prior call, this is not a widespread problem. In fact, as we learned this morning from Prime Clerk, over 100,000 packages were sent to Retirees. And, we have heard from less than 500 persons that they did not receive their solicitation packages-a number less than .5%. Thus, the problem is not nearly of the magnitude that you suggest. Even then, Prime Clerk is coordinating the expedited delivery of solicitation packages to those that have inquired.

Nevertheless, we are discussing internally and with Prime Clerk whether there is the possibility of a limited extension of the solicitation period. From a calculation perspective, and as I have indicated previously, Prime Clerk needs approximately three weeks to do the requisite tabulation. Accordingly, if there were an extension, it would be only until October 8, 2021 and, due to the interwoven nature of Plan requirements, it would be applicable to all claimants, not just Retirees.

We will let you know the position later today.

Brian

**Brian S. Rosen**

Partner

[Proskauer](#)

Eleven Times Square  
New York, NY 10036-8299  
d 212.969.3380  
m 914.393.3040  
f 212.969.2900  
[brosen@proskauer.com](mailto:brosen@proskauer.com)

**greenspaces**

Please consider the environment before printing this email.

---

**From:** Gordon, Robert D. <RGordon@jenner.com>  
**Sent:** Tuesday, September 21, 2021 9:12 PM  
**To:** Rosen, Brian S. <brosen@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; Johnson, Craig <cjohnson@primeclerk.com>  
**Cc:** Hector M. MayolKauffmann <hector.mayol@bennazar.org>; Francisco delCastillo Orozco <francisco.delcastillo@bennazar.org>; Catherine Steege <csteege@jenner.com>; Melissa Root <mroot@jenner.com>; Wedoff, Carl N. <CWedoff@jenner.com>  
**Subject:** Puerto Rico: retiree solicitation packages

***This email originated from outside the Firm.***

Good evening. As we have previously discussed, and now with less than two weeks to the voting deadline, it appears reasonably clear that a majority, and likely a significant majority, of retirees entitled to vote in Classes 51B, 51D, 51E, 51F, and 51L (erroneously labeled 51K at Section 55.12 of the Seventh Amended POA) have not received or did not timely receive their Plan of Adjustment solicitation packages. Upon information and belief, one cause for this appears to involve issues with the US Postal Service main branch facility in San Juan, where the building has been determined structurally unsound. As a result, upon information and belief, the bulk mailing of solicitation packages to retirees in Puerto Rico by Prime Clerk was not sorted and delivered promptly; rather, the mail was shipped to Memphis, Tennessee, where it was then sorted and re-sent to San Juan.

The voting period in this case was already quite short, just over 30 days, about half the time accorded to retirees for voting on the Plan of Adjustment in Detroit's bankruptcy. With this delay in delivery of solicitation materials, there is a significant threat of prejudice to the due process rights of retirees to vote on Puerto Rico's Plan of Adjustment. This issue presumably affects all on-Island creditors, most of whom are comprised by a few discrete classes under the Plan.

As a result, on behalf of the retirees entitled to vote in Classes 51B, 51D, 51E, 51F, and 51L, we believe an extension of the voting deadline by 2 weeks is warranted. Please let us know by close of business tomorrow whether the Oversight Board will enter into a Stipulation and Order with the Retiree Committee granting said extension; if we do not hear from you, it is our intention to file a motion on shortened notice seeking this relief. If you wish to discuss this matter further, please let me know. Regards,

Bob

---

**Robert D. Gordon**

**Jenner & Block LLP**

919 Third Avenue, New York, NY 10022-3908 | [jenner.com](http://jenner.com)

+1 212 891 1610 | TEL

+1 248 320 6254 | MOBILE

[RGordon@jenner.com](mailto:RGordon@jenner.com)

[Download V-Card](#) | [View Biography](#)

CONFIDENTIALITY WARNING: This email may contain privileged or confidential information and is for the sole use of the intended recipient(s). Any unauthorized use or disclosure of this communication is prohibited. If you believe that you have received this email in error, please notify the sender immediately and delete it from your system.

---

\*\*\*\*\*  
\*\*\*\*\*

This message and its attachments are sent from a law firm and may contain information that is confidential and protected by privilege from disclosure.

If you are not the intended recipient, you are prohibited from printing, copying, forwarding or saving them.

Please delete the message and attachments without printing, copying, forwarding or saving them, and notify the sender immediately.

\*\*\*\*\*  
\*\*\*\*\*